

FILED

April 9, 2025

2025 APR -9 AM 8:15

Clerk of the Court  
United States Bankruptcy Court  
District of Delaware  
824 N. Market Street, 3rd Floor  
Wilmington, DE 19801

CLERK  
US BANKRUPTCY COURT  
DISTRICT OF DELAWARE

Re: In re FTX Trading Ltd., et al. – Case No. 22-11068 (JTD)  
Emergency Motion of REBODEL IRA LLC (Claim No. 70619)

Dear Clerk of the Court,

Enclosed please find the following documents for filing in the above-referenced case:

- Emergency Motion of REBODEL IRA LLC to Debtors' Objection to Claim No. 70619
- Exhibits in Support of Emergency Motion
- Proposed Order
- Certificate of Service

I respectfully request that these documents be filed and docketed accordingly. If possible, I would appreciate a file-stamped copy returned to me at the address below. A self-addressed stamped envelope has been included for your convenience.

Thank you for your attention to this matter.

Sincerely,  
Rebecca Lynn O'Dell  
Manager for REBODEL IRA LLC  
3916 N Potsdam Ave. #4946  
Sioux Falls, SD 57104  
rebecca@stylsavvy.com  
415-205-7858  
[Filing pro se]

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

**FILED**  
2025 APR -9 AM 8:15  
CLERK  
US BANKRUPTCY COURT  
DISTRICT OF DELAWARE

In re:  
FTX Trading Ltd., et al, Debtors.

Case No. 22-11068 (JTD)  
Chapter 11 (Jointly Administered)  
Re: Docket No. 28225

**EMERGENCY MOTION OF REBODEL IRA LLC IN RESPONSE TO DEBTORS' OBJECTION  
TO CLAIM NO. 70619 AND REQUEST FOR EXPEDITED CONSIDERATION**

TO THE HONORABLE JOHN T. DORSEY, UNITED STATES BANKRUPTCY JUDGE:

REBODEL IRA LLC ("Movant"), a creditor in the above-captioned Chapter 11 case, respectfully submits this emergency motion to the Debtors' objection filed on November 27, 2024 (Docket No. 28225), which seeks to disallow and expunge Movant's proof of claim (Claim No. 70619, Scheduled Claim No. 6868557) in the amount of \$46,401.39. Movant requests that the Court overrule the objection and designate the claim as "Allowed" for inclusion in the convenience class distribution scheduled for April 11, 2025, pursuant to the Second Amended Joint Chapter 11 Plan. In support thereof, Movant states as follows:

**INTRODUCTION**

1. REBODEL IRA LLC ("Movant") hereby moves the Court on an emergency basis for entry of an order directing the FTX Debtors to update the status of its claim (Claim No. 70619) from "Disputed" to "Allowed" to ensure inclusion in the upcoming distribution scheduled as of the record date of **April 11, 2025**.
2. Movant has complied with all required onboarding procedures, including completing KYC verification and selecting BitGo as its Distribution Provider. The claim is under the Convenience Class and is for the amount of \$46,401.39.
3. Due to procedural delays and administrative failures beyond Movant's control, the claim remains marked as "Disputed," jeopardizing its eligibility for imminent distributions.
4. Movant seeks expedited consideration of this motion given the urgency imposed by the April 11, 2025 record date.

## BACKGROUND

5. Movant is the holder of Claim No. 70619, Scheduled Claim No. 6868557, Customer Code: 07755549, Platform FTX US and filed under the name REBODEL IRA LLC.
6. On November 27, 2024, Movant received a KYC-related objection notice under Docket 28225.
7. Movant completed full KYC verification on **December 10, 2024**, and successfully selected BitGo as Distribution Provider, with FTX portal Step 8 showing "Onboarding Complete" as of **April 1, 2025**.
8. Despite full compliance, FTX portal Step 9 continues to reflect the claim as "Disputed," and FTX Support has not provided any specific reason, stating only that "is still under review and has not yet been reconciled".
9. Movant has engaged in repeated outreach to FTX Support, BitGo, Kroll, and Persona, and has compiled a full communications timeline as Exhibit A (attached).
10. The failure of the Debtors to update the claim status from "Disputed" to "Allowed" threatens to wrongfully exclude Movant from the next distribution to Convenience Class claimants.

## Legal Basis & Case Law

11. This Motion is brought pursuant to 11 U.S.C. § 502(a), which provides that a properly filed proof of claim is deemed allowed unless objected to. Movant's Claim No. 70619 was duly submitted through the FTX Customer Claims Portal. The continued "Disputed" designation, despite full compliance and onboarding completion, has not been explained with specificity or supported by any evidence from the Debtors. The Court is further empowered under 11 U.S.C. § 105(a) to issue orders necessary or appropriate to carry out the provisions of the Bankruptcy Code, including the fair administration of claims and prevention of unjust exclusion from plan distributions.
12. Relief is also proper under Bankruptcy Rule 9014, which governs contested matters such as objections to claims, and allows the Court to fashion appropriate procedures to resolve the dispute expeditiously.

## **RELIEF REQUESTED**

13. Movant respectfully requests that this Court:
  - a. Enter an order determining that Claim No. 70619 filed by REBODEL IRA LLC is "Allowed" in the amount of \$46,401.39;
  - b. Direct the FTX Debtors to update the claim status in the portal and administrative systems to reflect the claim as "Allowed" prior to the April 11, 2025 distribution record date;
  - c. Grant such other and further relief as the Court deems just and proper.
14. Given the short window before the April 11, 2025 record date, expedited consideration is essential.
15. Without prompt resolution, Movant will be unjustly excluded from the Convenience Class distribution due to procedural failures beyond its control—despite having fully completed all onboarding steps required by the Debtors and BitGo. This would result in irreparable harm and denial of fair and equal treatment under the Plan.
16. Movant submits that good cause exists for the relief requested and that no party will be prejudiced by the granting of this motion.

## **EXPEDITED RELIEF**

17. Movant requests that the Court hear this motion on an expedited basis given the fast-approaching record date for the next distribution.
18. Movant requests leave to appear telephonically at any hearing on this motion.

## **NOTICE**

19. Notice of this Motion has been provided to:  
Counsel to the FTX Debtors (Sullivan & Cromwell LLP)  
The Office of the United States Trustee  
Kroll Restructuring (Claims Agent)

Movant submits that no further notice is required.

## **CONCLUSION**

**WHEREFORE, REBODEL IRA LLC respectfully requests that the Court enter an order:**

**Determining that Claim No. 70619 is Allowed;**

**Directing the Debtors to update the claim status from "Disputed" to "Allowed" without further delay;**

**Granting expedited consideration and any other relief deemed just and proper.**

**Dated: April 9, 2025  
Respectfully Submitted,**



**Rebecca Lynn O'Dell  
Manager for REBODEL IRA LLC  
3916 N Potsdam Ave. #4946  
Sioux Falls, SD 57104  
rebecca@stylsavvy.com  
415-205-7858  
Filing pro se**

### Exhibit A: TIMELINE OF EFFORTS TO RESOLVE KYC AND DISTRIBUTION SELECTION

The correspondence timeline below demonstrates Movant's persistent attempts to complete KYC and select BitGo as distribution provider from October 2024 to April 2025, despite significant delays and lack of support from FTX and BitGo, which contributed to the claim's "Disputed" status under Docket 28225. Additional exhibits are a separate document that include screenshots and correspondence that corroborate this account.

| Date                   | Entity/Contact                                      | Summary of Communication   | Outcome/Impact   |
|------------------------|---|--|--|
| 21-Oct-24              | FTX<br>tax@ftx.com                                  | Email received stating my KYC was "incomplete."  | Prompted me to address the KYC issues.   |
| 27-Oct-24              | FTX<br>support@ftx.com                              | Email sent about inability to log into BitGo; FTX directed me to BitGo Support.  | Reported to FTX Support that I could not log into my BitGo account to complete KYC.  |
| 27-Oct-24              | BitGo<br>support@bitgo.com                          | Email sent about login issues; BitGo suggested resetting 2FA, but it failed with an error. Initial BitGo support ineffective; login remained unresolved. |  |
| 27-Oct-24 to 30-Oct-24 | BitGo<br>support@bitgo.com                          | Multiple emails sent requesting 2FA reset; BitGo responses vague, requested unprovided info.   |  |
| 31-Oct-24              | BitGo<br>support@bitgo.com / FTX<br>support@ftx.com | Email sent including all REBODEL IRA LLC KYC documents as attachment. Sent to both BitGo and FTX as separate emails.                                     |  |
| 2-Nov-24               | BitGo<br>support@bitgo.com                          | Email received stating my 2FA was reset; I logged in. There was a "We will contact you soon" landing page, but no account access.                        | Partial BitGo log achieved; BitGo login fixed, but no account access due to landing page. (See <i>Exhibit B-1: Landing Page Screenshot</i> ) |
| 5-Nov-24 to 13-Nov-24  | BitGo<br>support@bitgo.com / Persona                | Emailed BitGo and Persona about removing the landing page; ignored. Lack of response further delayed KYC completion.                                     |  |

| Date                      | Entity/Contact  | Summary of Communication   | Outcome/Impact   |
|---------------------------|---|--|--|
| 27-Nov-24                 | Kroll<br>ftxnoticing@r<br>a.kroll.com                             | Email received from Kroll: Notice of Objection of Unverified Claims (Docket 28225) to disallow my claim due to unverified KYC.   | (See Exhibit C-1: Notice of Objection of Unverified Claims (Docket 28225) Screenshot)  |
| 9-Dec-24                  | Persona<br>ftx-creditor-<br>support@case<br>s.withpersona.<br>com | Email received requesting additional KYC info; I provided it same day;   | Still no BitGo account access due to landing page. (See Exhibit B-1)   |
| 12-Jan-25                 | BitGo@BitGo<br>Twitter/X<br>DMs                                   | Replied to a BitGo tweet requesting help with KYC; began DMs with @BitGo.  | Public outreach on Twitter/X due to unresponsive emails; initiated direct BitGo Twitter DM engagement.                                       |
| 12-Jan-25                 | Persona<br>ftx-creditor-<br>support@case<br>s.withpersona.<br>com | After multiple DMs with @BitGo on Twitter/X, I received an email confirming KYC complete; BitGo login fixed, FTX portal (Step 3) KYC "Complete".<br>KYC completed.<br>But new issues with FTX portal (Step 8) Distribution Provider Selection. | FTX portal (Step 8) routes me to BitGo log in. Logging into BitGo account shows " We will contact you soon" landing page.                    |
| 18-Jan-25                 | BitGo<br>support@bitg<br>o.com                                    | Multiple emails sent to BitGo and FTX trying to get their support before the Jan 20 Initial Distributions deadline.  | (See Exhibit D-1: Email sent to BitGo requesting to remove landing page)   |
| 15-Jan-25 to<br>21-Jan-25 | BitGo@BitGo<br>Twitter/X<br>DMs                                   | DMs with @BitGo to resolve persistent BitGo landing page, which blocked BitGo account access needed to complete (Step 8).  | BitGo delays prevented Distribution Provider Selection before Jan 20 deadline. (See Exhibit E-1 through E-3: Twitter/X DMs with BitGo@BitGo) |
| 9-Feb-25                  | FTX<br>support@ftx.c<br>om  | Email received announcing Step 9 live in portal;   | Logging into FTX portal now shows Step 9 and claim set to "Disputed."  |

| Date                   | Entity/Contact             | Summary of Communication   | Outcome/Impact   |
|------------------------|----------------------------|--|--|
| 10-Feb-25              |                            | Retried the FTX portal (Step 8) Distribution Provider Selection. Successfully logged into BitGo. Landing page is now removed. Selected BitGo as my Distribution Provider.                      |  |
| 10-Feb-25              | BitGo support@bitgo.com    | FTX Portal still does not show BitGo as my selected Distribution Provider.   | (See Exhibit F-1: BitGo email confirming FTX KYC and advising to contact FTX)  |
| 12-Feb-25              | BitGo noreply@bitgo.info   | Email received confirming BitGo as Distribution Provider;  | BitGo recognized selection as Distribution Provider, but FTX portal (Step 8) still does not show BitGo as my selected Distribution Provider. (See Exhibit G-1: BitGo email confirming Distribution Provider) |
| 14-Feb-25 to 20-Mar-25 | FTX support@ftx.com        | Multiple emails sent about (Step 8) not reflecting BitGo as my Distribution Provider; FTX escalated to tech team. It was resolved on 1-Apr-25.   | Delays in FTX portal (Step 8) not updated further prolonged "Disputed" status. (See Exhibit H-1 and H-2: BitGo Approved as Distribution Provider but not on FTX Portal)                                      |
| 1-Apr-25               |                            |  | FTX portal (Step 8) updated to "Onboarding Complete".  |
| 2-Apr-25               | FTX support@ftx.com        | Email sent to FTX confirming (Step 8) updated to "Onboarding Complete" and querying why (Step 9) is still set to "Disputed."   | Emailed FTX. (See Exhibit I-1: Requesting FTX for clarification on Disputed state)   |
| 3-Apr-25               | FTX support@ftx.com        | Email received from FTX stating 4 reasons for a Disputed Claim. Only one reason is viable in my case: "A proof of claim was filed that is still under review and has not yet been reconciled". | FTX response. (See Exhibit J-1: FTX emailed response about Disputed state)   |
| 3-Apr-25               | Kroll FTXInfo@ra.kroll.com | Urgent email sent to Kroll requesting claim details and dispute resolution steps;  | Sought clarification directly from Kroll (See Exhibit K-1: Requesting Kroll for clarification on Disputed state)   |



| Date     | Entity/Contact                | Summary of Communication   | Outcome/Impact  |
|----------|-------------------------------|--|---|
| 7-Apr-25 | Kroll<br>FTXInfo@ra.kroll.com | Email received from Kroll. It states "such claim requires further investigation or review and is not at this time "Allowed". | Sought clarification directly from Kroll ( <i>See Exhibit L-1: Requesting Kroll for clarification on Disputed state</i> ) |

**Exhibits in Support of Emergency Motion of REBODEL IRA LLC  
(Re: Docket No. 28225, Claim No. 70619)**

The following exhibits are submitted in support of the Emergency Motion of REBODEL IRA LLC. These documents corroborate the timeline and demonstrate Movant's continuous good faith efforts to complete all required onboarding steps and resolve administrative barriers.

**Exhibit B-1: Landing Page Screenshot**

----- Original Message -----

**From:** Rebecca O'Dell [[rebecca@stylsavvy.com](mailto:rebecca@stylsavvy.com)]  
**Sent:** 11/2/2024 11:55 PM  
**To:** [support@bitgo.com](mailto:support@bitgo.com)  
**Cc:** [rebecca@stylsavvy.com](mailto:rebecca@stylsavvy.com)  
**Subject:** Re: Cannot log in [ thread::oqSgw16GVKe5SydTP8y1CU:: ]

Thank you. I logged in and set up the new 2FA. This resulted in a page with the following text. I am standing by to complete this process and finish the KYC.

Best,  
Rebecca O'Dell  
REBODEL IRA LLC  
415-205-7858

## **We will contact you soon**

Your application has been completed. Our team will contact you soon with next steps.

On Nov 2, 2024, at 7:24 AM, BitGo Support <[support@bitgo.com](mailto:support@bitgo.com)> wrote:

Hi Rebecca,

Thanks for getting back to us.

We completed the process of resetting your Two-Factor Authentication.

Please log back into your account, and follow the instructions to set up your Two-Factor Authentication again.

Please let us know if you encounter any issues with completing this.

Best Regards,

Lalit M.  
BitGo Technical Support

**Exhibit C-1: Notice of Objection of Unverified Claims (Docket 28225)**  
**Screenshot**



FTX Noticing <ftxnoticing...> FTX November 27, 2024 at 3:19 PM  
In re FTX Trading Ltd., et al, Case No. 22-11068, US... Details  
To: Rebecca O'Dell <rebecca@stylsavvy.com>,  
Reply-To: ftxnoticing@ra.kroll.com

**NOTICE TO ALL HOLDERS OF UNVERIFIED CLAIMS: THE DEBTORS HAVE FILED AN OBJECTION SEEKING TO DISALLOW AND EXPUNGE YOUR CLAIM. IF THE COURT SUSTAINS THE DEBTORS' OBJECTION, MARCH 1, 2025 WILL BE THE DEADLINE TO COMMENCE THE KYC SUBMISSION PROCESS AND JUNE 1, 2025 WILL BE THE DEADLINE TO SUBMIT ALL REQUESTED KYC INFORMATION THROUGH THE FTX CUSTOMER CLAIMS PORTAL.**

**LOG IN TO THE FTX CUSTOMER CLAIMS PORTAL USING YOUR FTX LOG-IN INFORMATION BY CLICKING HERE: [HTTPS://CLAIMS.FTX.COM](https://claims.ftx.com). COMMENCE OR CONTINUE THE KYC SUBMISSION PROCESS BY MOVING TO STEP 3 OF THE FTX CUSTOMER CLAIMS PORTAL.**

**ONLY SUBMIT SENSITIVE INFORMATION VIA THE CUSTOMER CLAIMS PORTAL.**

**This email contains important instructions for submitting KYC information and we encourage you to read it in its entirety.**

On November 21, 2024, FTX Trading Ltd. and certain of its affiliated debtors and debtors-in-possession (collectively, the "Debtors") filed an **Omnibus Objection to Unverified Customer Entitlement Claims** with the United States Bankruptcy Court for the District of Delaware (the "Court") [D.I. 28225] (the "KYC Objection") in the Debtors' chapter 11 cases (the "Chapter 11 Cases"). Please find below a link to the KYC Objection and the notice attached thereto.

**Debtors' One Hundred Thirtieth (Non-Substantive) Omnibus Objection to Unverified Customer Entitlement Claims. Hearing Scheduled for 1/23/2025 at 10:00 AM (ET). Objections due by 12/18/2024 at 4:00 PM (ET) [D.I. 28225]**



You are receiving this email because you have not completed the KYC submission process with respect to the following Customer Entitlement Claim(s) (as defined below) associated with your unique customer ID and such claims remain "unverified" ("Unverified Claims"):

**Unique Customer Code(s): 07755549**

**Claim No(s): 70619**

**Scheduled Claim No(s): 6868557**

**Exhibit D-1: Email sent to BitGo requesting to remove landing page)**

 **Rebecca O'Dell** <re...@...>  Sen...change January 18, 2025 at 4:05 PM  
Re: 2FA is no longer working. [ thread::9NKuvNwBF... ]  
To: BitGo Support <support@bitgo.com> & 2 more [Details](#)

---

Hi Devu,

Thank you for your assistance so far! After logging into my BitGo account, I'm presented with two landing pages (screenshots below). Unfortunately, I'm unable to get past these landing pages to access my account. Could you please remove the landing pages or provide a solution to resolve this issue?

I'm urgently trying to complete Step 8 of the FTX selection of the Distributions Provider. This is the final step required to meet the requirements for the FTX Initial Distribution, which has a deadline of this Monday, January 20.

For context: Over the past two months, I worked with BitGo Support teams to complete the KYC process for my US FTX institutional account, REBODEL IRA LLC. During this process, my BitGo login was modified to show the two landing pages. This now prevents me from accessing my account.

I would greatly appreciate your prompt assistance in resolving this matter.

Best,  
Rebecca O'Dell

REBODEL IRA LLC  
Account ID 9178291  
Unique Customer Code 7755549  
Platform FTX\_US

**We will contact you  
soon**

Your application has been completed. Our team will contact you soon with next steps.

## Exhibit E-1 and E-2: Twitter/X DMs with BitGo@BitGo

BitGo

However, sadly I've hit another roadblock.

Jan 15, 2025, 1:18 PM

What is the roadblock?

Jan 15, 2025, 1:20 PM

**We will contact you soon**

Your application has been completed. Our team will contact you soon with next steps.

Now that the KYC has completed, I want to select the Distributions Provider on Step 8. The only option is BitGo. When I select BitGo, it takes me to login on BitGo. After I log in to BitGo, I'm presented with the screen attached. Can this be changed so I can see my BitGo account?

Jan 16, 2025, 1:21 PM

**Finishing account setup**

Please wait while we finish setting up your account. This might take a minute.

When I log into BitGo, I'm presented with the 'Finishing account setup'. After 30 seconds or so it shows the 'We will contact you soon' page.

Can this page be removed so I can complete the selection of BitGo as the Distribution Provider. It's the last step for completing the requirements for the Initial Distribution, which ends on Monday (Jan 20). Please help me it's \$40k of my retirement.

Jan 16, 2025, 9:13 AM

Can you email [fxcreditors@bitgo](mailto:fxcreditors@bitgo) with the above screenshots and drop me the ticket #?

BitGo

Can you email [fxcreditors@bitgo](mailto:fxcreditors@bitgo) with the above screenshots and drop me the ticket #?

I can escalate it for you.

Jan 16, 2025, 11:49 AM

Thank you. I sent them the email with the screen shots. Here is the case number:  
BitGo Support <[support@bitgo.com](mailto:support@bitgo.com)>  
Case Received - BitGo Login not working correctly - (#00317885)

Jan 16, 2025, 2:29 PM

I flagged it internally :-)

Thanks for your patience.

Jan 16, 2025, 3:30 PM

Thank you so much. I'll be standing by

Jan 16, 2025, 3:55 PM

Any luck with getting resources on this? I appreciate your help. Just want to know if I'll have access to my account by Monday so I can complete the claims process.

Jan 17, 2025, 12:50 PM

Hmm. I will flag it again. Sorry about that.

Jan 17, 2025, 12:54 PM

Thank you!

Jan 17, 2025, 3:19 PM

The following landing page has not been removed from my BitGo login. Can you please tell me why the support team cannot remove it? Today is the final day to sign up for FTX Initial Distribution. Please help me, I am sick to my stomach

We will contact you soon  
Your application has been completed. Our team will contact you soon with next steps.

Jan 20, 2025, 12:54 PM

**Exhibit E-3: Twitter/X DMs with BitGo@BitGo con't**



I've once again flagged your account internally, I see, the team has been talking about your situation internally and apologize for the delay.

Jan 20, 2025, 5:45 PM

Thank you for sharing this information. What is the situation that the team is discussing? Can you please share with me the details?  
I opened an institutional account with FTX in Aug 2021. I went through KYC at that time. I deposited ~\$50,000. I opened my IRA LLC in 2017. FTX went bankrupt. I filed a claim. Now BitGo is preventing me from completing the claim. Why? Please tell me.  
I also have an institutional account with Kraken. Why is BitGo preventing me from claiming my money? This is absolutely nuts.,

Jan 21, 2025, 12:19 AM

I apologize for the delay, it's been an extended holiday weekend here in the states.

I will personally keep an eye on your situation tomorrow and try to get you clarity.

We're just the social team here passing information to the support team, I appreciate your patience here and want to get you a resolution.

Jan 21, 2025, 12:27 AM

Someone should be replying to you shortly with some details.

Jan 21, 2025, 12:42 AM

I truly appreciate your help and responsiveness. Over the last two months, BitGo has prevented me from completing my FTX claim, and while their support team has not been responsive, your efforts have made a difference.

I'll wait for details from your team and hope to receive them within a week. If I don't hear back by then, I will need to explore further actions to resolve this.

Jan 21, 2025, 1:05 AM

This whole experience has been incredibly excruciating



**Exhibit F-1: BitGo email confirming FTX KYC and advising to contact FTX**



BitGo Support <support@bitgo.com>

FTX February 10, 2025 at 7:19 PM

Re: BitGo Preventing me from completing my FTX Claim [ thread::XkJW1...

To: Rebecca O'Dell <rebecca@stylsavvy.com> Cc: & 1 more

[Details](#)

Hi Rebecca,

Your FTX enterprise has been fully KYC'd and approved - you may reach out to [support@ftx.com](mailto:support@ftx.com) to check why the portal is not updated. But at this point, once the FTX portal is updated - you should be able to complete the 8th Step in the process. Nothing pending or under review at BitGo in your account.

Best Regards,

Nandish D.

BitGo Technical Support

----- Original Message -----

**From:** Rebecca O'Dell [[rebecca@stylsavvy.com](mailto:rebecca@stylsavvy.com)]

**Sent:** 2/10/2025 5:01 PM

**To:** [support@bitgo.com](mailto:support@bitgo.com)

**Cc:** [rebecca@stylsavvy.com](mailto:rebecca@stylsavvy.com)

**Subject:** Re: BitGo Preventing me from completing my FTX Claim [ thread::XkJW1-3FHs6Qeu7fk88JxSU:: ]

Also I wanted to add that I received the verification confirmation email at 3:00pm today. I was able to log into my account for the first time. But it showed that I needed to complete KYC. I thought my KYC was already approved, but I completed it again. Perhaps that put my account in a wrong state.

Can you please provide guidance on the next steps? I will be able to select the Distribution Provider on the FTX Claims Portal.

Best,

Rebecca O'Dell

**Exhibit G-1: BitGo email confirming Distribution Provider**



**BitGo** <noreply@bitgo.info>

FTX February 12, 2025 at 10:32 AM

**Welcome to BitGo: Secure Your Funds with Confidence**

To: Rebecca O'Dell <rebecca@stylsavvy.com>,

Reply-To: noreply@bitgo.info



**BitGo**

[Sign up to receive our newsletter →](#)



**Trusted by Institutions. Built for You.**

Hi there,

Welcome to BitGo! For over a decade, we've been the trusted security partner for some of the world's largest institutions.

Now, we're here to help you secure your assets as an FTX user selecting BitGo as your distribution partner.

Here's how to get started:

- Log in at [bitgo.com/welcome](https://bitgo.com/welcome)
- Access your distributed funds securely on our platform once they are released by FTX
- Make your first deposit

As a BitGo customer, you'll also be entered to win one entire bitcoin by completing these simple steps:

- Onboard and verify your account
- Keep your funds on the platform through June 30, 2025

We're here to help you every step of the way. Whether you're safeguarding your funds or exploring advanced tools to grow your portfolio, BitGo offers the expertise and solutions you need.

**Make Your First Deposit Today**

Warm regards,  
The BitGo Team



## Exhibit H-1 and H-2: BitGo Approved as Distribution Provider but not on FTX Portal

Rebecca O'Dell <rebecca@stylsavvy.com> Sent - Exchange February 14, 2025 at 1:01 PM  
Onboarding Issues  
To: support@ftx.com & 1 more Details

Dear FTX Support,

After many months, I finally got BitGo to complete the KYC of my institutional FTX account, REBODEL IRA LLC (a self directed IRA that I use to invest in crypto). This week I was able to process Step 8 Select the Distribution Provider and log into BitGo from the FTX portal. As a result, I received the attached welcome email from BitGo that confirms themselves as the distribution provider.

After achieving this confirmation, I was expecting that step 8 on the FTX portal would be updated with a green checkmark, but nothing changed. Also, clicking on Step 5 does nothing and Step 9 shows a status of disputed.

Below are screenshots of BitGo confirming themselves as the distribution provider and the state of each step on the FTX portal. Can you please provide guidance on how the onboarding can be updated so I can complete the FTX claim?

Rebecca O'Dell  
FTX Institutional Account: REBODEL IRA LLC  
Account ID: 9178291  
Unique Customer Code: 7755549  
Email: [rebecca@stylsavvy.com](mailto:rebecca@stylsavvy.com)  
Platform: FTX\_US

Screenshot: BitGo confirming themselves as the distribution provider.

BitGo <noreply@bitgo.info> FTX February 12, 2025 at 10:32 AM  
Welcome to BitGo: Secure Your Funds with Confidence  
To: Rebecca O'Dell <rebecca@stylsavvy.com>  
Reply-To: noreply@bitgo.info



Rebecca O'Dell <rebecca@stylsavvy.com> Sent - Exchange March 20, 2025 at 12:00 PM  
Re: [Please use [support@ftx.com](mailto:support@ftx.com)] Onboarding Issues  
To: FTX Support <support@ftx.com> & 1 more Details

Hi,

I completed step 8 again. It simply logged me into my BitGo account. As far as BitGo is concerned, I already selected them as the Distribution Provider. Below is a screenshot of the confirmation email from BitGo as the chosen Distribution Provider. Also there are screenshots for each of the steps on the FTX Portal. It seems my BitGo account and the FTX account are not in sync.

Best,  
Rebecca O'Dell  
REBODEL IRA LLC

BitGo Distribution Selection Confirmation - Feb 12

BitGo <noreply@bitgo.info> FTX February 12, 2025 at 10:32 AM  
Welcome to BitGo: Secure Your Funds with Confidence  
To: Rebecca O'Dell <rebecca@stylsavvy.com>  
Reply-To: noreply@bitgo.info



**Exhibit I-1: Requesting FTX for clarification on Disputed state**

Rebecca O'Dell <rebecca@stylsavvy.com>  
 Re: [Please use [support@ftx.com](mailto:support@ftx.com)] Onboarding Issues  
 To: FTX Support <support@ftx.com> & 1 more  
 Sent - Exchange April 2, 2025 at 4:49 PM  
 Details

Hello,

Thank you for this update. Yes, I logged in yesterday and saw that the Step 8 - Distribution Service Provider state had been updated to 'Onboarding Complete'. We are getting close.

Now, the last state that is messed up is Step 9 - Distribution Dashboard. The screenshot below shows that the Claims Status is set to Disputed. I never received any emails indicating that my claim was disputed. I never received a Claim Number.

ChatGPT suggested that I searched the Claims Register for REBODEL IRA LLC and Rebecca O'Dell. Neither entities are listed.

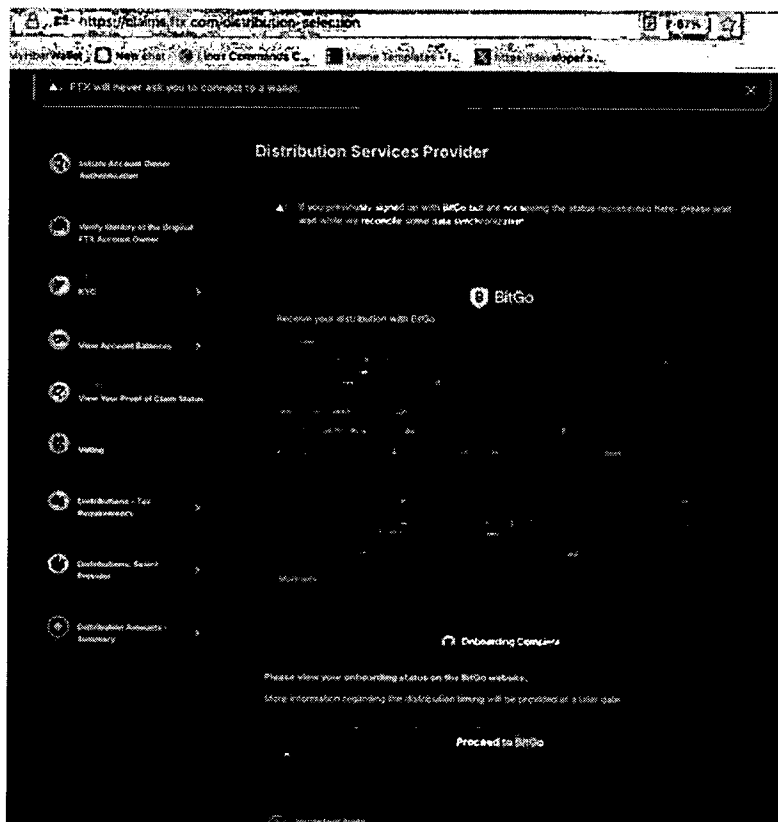
Can you please provide guidance?

1. Why is the Claims Status set to Disputed?
2. How can I get the Claims Status changed so my claim will be honored?
3. Who can I work with to change my Claims Status to honored?



This whole process has been such a struggle. I have been working with both FTX Support and BitGo. Support non stop since November. How can I get my retirement money back? Please help me.

Best,  
 Rebecca O'Dell  
 REBODEL IRA LLC

Account ID 9178291  
 Unique Customer Code 7755549  
 Email [rebecca@stylsavvy.com](mailto:rebecca@stylsavvy.com)  
 Platform FTX\_US



## Exhibit J-1: FTX emailed response about Disputed state

 FTX Support <support@ftx.com>  FTX April 3, 2025 at 12:09 AM  
[Please use support.ftx.com] Re: Onboarding Issues  
To: Rebecca O'Dell <rebecca@stylisavvy.com>  
Reply-To: FTX Support <support@ftx.com>

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\*\*\* Please type your reply above this line \*\*\*  
Your request (289653) has been updated.  
To add additional comments, reply to this email.



Shandle (Please use support.ftx.com)

Apr 2, 2025, 2:09 PDT

Hi there,

For your Step 9, please click on the "I" icon for more information as to why your claims status is marked as disputed:

Any Claim that is not "Allowed" (as defined in Section 2.1.8 of the Second Amended Joint Chapter 11 Plan (Docket ID 26404, Exhibit A)) and is not subject to a valid and timely Bahamas Opt-In Election remains a "Disputed Claim". The FTX Recovery Trust is in the process of reconciling all Claims and certain Disputed Claims may later become Allowed and eligible to receive a Distribution. This may be due to the following reasons (among other things):



- A proof of claim was filed that is still under review and has not yet been reconciled.
- Your jurisdiction is still under review and is currently not eligible for distributions.
- You received partial distributions from the FTX Australia proceedings and are still under review to reconcile the remaining amount of your claim.
- You are a Liquid Global exchange customer and are still under review as recognition proceedings for the chapter 11 plan move forward in Singapore.

More information can be found here: <https://support.ftx.com/the-en-us/articles/34522100742804-Distributions-Dashboard-FAQ>

Thank you,

FTX Customer Support

## Exhibit K-1: Requesting Kroll for clarification on Disputed state

 Rebecca O'Dell <rebecca@stylsavvy.com>  FTX April 3, 2025 at 5:25 PM  
Re: URGENT + Disputed Claim Status and Claim Number Request - RE... Details  
To: FTXInfo@ra.kroll.com <FTXInfo@ra.kroll.com>

Dear Kroll Team,

As a follow-up to my previous message, I would like to provide additional supporting information regarding my claim status.

On November 27, 2024, I received a formal notice from [ftxnoticing@ra.kroll.com](mailto:ftxnoticing@ra.kroll.com) stating that my claim was deemed "Unverified" due to incomplete KYC at that time. The details are as follows:

- Unique Customer Code: 07755549
- Claim Number: 70619
- Scheduled Claim Number: 6868557

Since receiving that notice, I have successfully completed the full KYC and onboarding process. This is confirmed in the FTX Customer Claims Portal, where Step 8 now shows "Onboarding Complete."

To summarize my account details:

- Name: Rebecca O'Dell
- Entity: REBODEL IRA LLC
- Account ID: 9178291
- Email: [rebecca@stylsavvy.com](mailto:rebecca@stylsavvy.com)
- Platform: FTX\_US

I understand that completing the KYC process satisfies the court's requirements for verification under Docket 28225, and I respectfully request that my claim now be marked as "Allowed" in time for the upcoming April 11, 2025 distribution deadline.

Thank you again for your attention and support.

Sincerely,  
Rebecca O'Dell  
REBODEL IRA LLC

## Exhibit L-1: Kroll emailed response about Disputed state

**From:** FTX Trading Ltd. ftxinfo@ra.kroll.com  
**Subject:** RE: [EXTERNAL] Request for Claim Number and Status – REBODEL IRA LLC (FTX Institutional Account)  
**Date:** April 7, 2025 at 3:44 PM  
**To:** rebecca@stylsavvy.com  
**Cc:** rebecca@stylsavvy.com



Rebecca,

Thank you for your inquiry.

If you filed a claim electronically using the Kroll Proof of Claim Portal, you should have received an email from noreply@ra.kroll.com containing a confirmation ID. Once your claim is processed, you may use this confirmation ID to search for your claim on the claims register and locate your assigned claim number.

In order to access the claims register on the Kroll website, please visit <https://restructuring.ra.kroll.com/FTX/Home-ClaimInfo>. You may also access the claims register by clicking on the "Claims" link on the left-hand side of the Kroll website here: <https://restructuring.ra.kroll.com/FTX/Home-ClaimInfo>.

Please select "advanced" on the right-hand side of the search bar and enter the confirmation ID located in the email you received into the "Confirmation ID" field and click "SEARCH". Information regarding your filed proof of claim should appear below. If your proof of claim was filed recently and does not yet appear, please allow time for processing and check back shortly.

Furthermore, a "Disputed" designation on the customer claims portal with respect to a claim reflects a determination by the FTX Recovery Trust that such claim requires further investigation or review and is not at this time "Allowed" as defined in section 2.1.8 of the Second Amended Joint Chapter 11 Plan of Reorganization of FTX Trading Ltd. and Its Debtor Affiliates [Docket No. 26404-1]. The FTX Recovery Trust is in the process of reconciling hundreds of thousands of claims and cannot provide specific information about individual claims. When there is an update with respect to the status of your claim, the FTX Recovery Trust will notify you or object to your claim, as applicable.

For more information, please visit: <https://support.ftx.com/hc/en-us/articles/34522100742804-Distributions-Dashboard-FAQs>.

Information, including access to court documents, instructions on how to file a proof of claim, and important dates and deadlines will be available throughout the case at <https://restructuring.ra.kroll.com/FTX/>.

PLEASE NOTE: Kroll is the appointed claims and noticing agent for FTX Trading Ltd. and 101 affiliated debtors' chapter 11 cases. As such, we are not permitted to provide legal or financial advice. Further, Kroll is not permitted to accept claims via email or fax, and any such information provided via either of these methods will not constitute a claim in these proceedings.

Regards,

Kroll Inquiries

[www.kroll.com](https://www.kroll.com)

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FTX Trading Ltd., et al, Debtors.

Case No. 22-11068 (JTD)

Chapter 11 (Jointly Administered)

Re: Docket No. 28225

**[PROPOSED] ORDER GRANTING EMERGENCY MOTION OF REBODEL IRA LLC FOR  
DETERMINATION OF CLAIM STATUS**

Upon consideration of the Emergency Motion of REBODEL IRA LLC (the "Motion") regarding Debtors' Objection to Claim No. 70619 (Docket No. 28225), and for good cause shown, it is hereby:

ORDERED that the Motion is GRANTED; and it is further

ORDERED that Claim No. 70619 filed by REBODEL IRA LLC is deemed ALLOWED in the amount of \$46,401.39; and it is further

ORDERED that the Debtors are directed to update the claim status for Claim No. 70619 in the Customer Claims Portal and all administrative systems to reflect "Allowed" prior to the April 11, 2025 distribution record date; and it is further

ORDERED that the Court retains jurisdiction with respect to all matters arising from or related to the implementation of this Order.

Dated: \_\_\_\_\_, 2025

Wilmington, Delaware

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The Honorable John T. Dorsey  
United States Bankruptcy Judge

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FTX Trading Ltd., et al, Debtors.

Case No. 22-11068 (JTD)

Chapter 11 (Jointly Administered)

Re: Docket No. 28225

**CERTIFICATE OF SERVICE**

I, Rebecca Lynn O'Dell hereby certify that on April 9, 2025, upon filing the attached Emergency Motion with the United States Bankruptcy Court for the District of Delaware, I will serve a true and correct copy of the Motion, Exhibits, Proposed Order, and this Certificate of Service upon the following parties via email;

**Counsel for the Debtors:**

Adam Goldberg, Esq.

James L. Bromley, Esq.

SULLIVAN & CROMWELL LLP

Email: ftxinfo@sullcrom.com

**Office of the United States Trustee:**

Linda Casey, Esq.

Office of the United States Trustee for the District of Delaware

Email: linda.casey@usdoj.gov

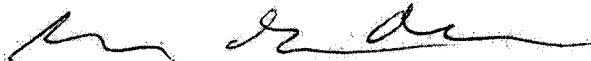
**Claims Agent (Kroll Restructuring):**

Email: ftxinfo@ra.kroll.com

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: April 9, 2025

Respectfully Submitted,



Rebecca Lynn O'Dell

Manager for REBODEL IRA LLC

3916 N Potsdam Ave. #4946

Sioux Falls, SD 57104

rebecca@stylsavvy.com

415-205-7858

Filing pro se